

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
MAR 31 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Revision of the Commission's Rules)
To Ensure Compatibility with)
Enhanced 911 Emergency)
Calling Systems)

CC Docket No. 94-102

To: Chief, Wireless Telecommunications Bureau

QUARTERLY UPDATE TO REQUEST FOR WAIVER OF SECTION 20.18

Public Service Cellular, Inc. ("PSCI"), by its attorneys, hereby files a quarterly update to its request for rule waiver ("Waiver") of Section 20.18 of the Commission's Rules, pursuant to the FCC's Order released on November 13, 1998.¹ On December 4, 1998, PSCI filed for a waiver of Section 20.18 the Commission's rules regarding the transmission of 911 calls made from TTY devices using digital wireless systems. PSCI requested the Waiver until compliant equipment becomes commercially available. The Commission granted PSCI a temporary waiver of Section 20.18, which went into effect on January 1, 1999.² In order to maintain its Waiver, PSCI must file quarterly updates to show what advances have been made in the development of commercially available equipment. In support thereof, the following is respectfully shown:

¹In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Nov. 13, 1998 ("Order I").

²In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Dec. 31, 1998 ("Order II").


Order I sets forth specific questions that should be answered in support of waivers of Section 20.18. PSCI submits that these questions relate to the specifications of the equipment that is being developed to provide TTY compatible service, and as such are beyond the scope of information which PSCI alone can provide. Therefore, such questions are more appropriately addressed by PSCI's equipment vendor because the equipment vendor, and not PSCI, is directly involved in developing compliant equipment. As evidenced in Exhibit A hereto, PSCI timely requested updated information from its equipment vendor to extend its waiver of Section 20.18. PSCI requested that its equipment vendor provide responses to all information set forth in the Order in sufficient time to meet the instant deadline; however, PSCI has yet to receive a formal response from its equipment vendor. PSCI will supplement this filing upon receipt of such response. PSCI respectfully requests a waiver of Section 20.18 of the Commission's rules until such time as compliant equipment is available from its equipment vendor.

In accordance with the terms of Order I, on a quarterly basis PSCI will continue to request updated information from its equipment vendor regarding its progress on developing compliant equipment and submit such updates to extend this waiver request. As soon as equipment is

commercially available from its equipment vendor, PSCI intends to comply with Section 20.18 of the Commission's rules.

Respectfully submitted,

PUBLIC SERVICE CELLULAR, INC.

A handwritten signature in cursive script, appearing to read "Jeanne W. Stockman", is written over a horizontal line.

Michael K. Kurtis
Jeanne W. Stockman
Its Attorneys

Kurtis & Associates, P.C.
2000 M Street, N.W., Suite 600
Washington, D.C. 20036
(202) 328-4500

Dated: March 31, 1999

EXHIBIT A



March 26, 1999

Ms. Vickie L. Sykes
Lucent Technologies, Inc.
Network Systems
280 Wceping Willow Way
Tyronc, GA 30290

Re: Compliance with FCC Requirements to Provide 911 TTY Access
Over Digital Networks

Dear Ms. Sykes:

As you are aware Public Service Cellular, Inc.(PSCI) currently utilizes your Company's IS-136 and CDMA infrastructure equipment to provide digital cellular and PCS service throughout its licensed service areas.

Section 20.18 of the FCC rules requires non-discriminatory access to state and local government services such as 911 for people with speech or hearing disabilities. Specifically, the Commission's rules require that all licensees provide TTY access to 911 services over cellular, PCS and certain SMR networks. Until now, the FCC has not enforced this requirement with respect to carriers operating in the digital format. We understand that this forbearance has been based upon the recognition by the FCC that none of the current digital protocols (TDMA, CDMA, iDEN or GSM) are capable of passing TTY data with an acceptable error rate.

Pursuant to the requirements under which Public Service Cellular, Inc. sought its initial waiver request, PSCI must file submissions every three months, beginning on the date of the waiver grant, indicating the progress being made towards implementation of TTY/digital capability. In accordance with the FCC requirement to file quarterly progress reports, we therefore ask that you provide us with an update of the projected timetable regarding availability of the requisite infrastructure equipment to enable the system which we presently have operating to be fully compliant. In addition, we ask that you provide us with a formal quote for that upgrade as soon as it has completed any requisite FCC type acceptance procedures and becomes commercially available. In addition, we ask that you provide us with the names of any alternate system suppliers which might provide this functionality on an ancillary basis, with equipment that is capable of interfacing with the infrastructure equipment which you have provided.

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Until such time as you can provide us with the requisite infrastructure upgrades to enable us to fully comply with the requirements of Section 20.18, we will continue to request information from you on a quarterly basis in order to sustain PSCI's waiver.

As previously noted, the FCC is requiring certain technical information to be included in the waiver submission in order for it to receive favorable consideration. Most of the information sought by the FCC appears to pertain to equipment vendors' ability to supply digital wireless licensees with compliant equipment. Accordingly, in addition to the information requested above, we ask that you provide us with specific responses to the items presented below. Public Service Cellular, Inc. intends to submit a copy of your response to the FCC in support of Public Service Cellular, Inc.'s request for waiver on March 31, 1999. Therefore, if any of the information which you provide in response to any item set forth below is confidential and therefore subject to the non-disclosure provisions of our Supply Agreement, we ask that you submit a formal answer to each item with such specificity which you would allow to be disclosed publicly to the FCC and provide a detailed response (stamped as confidential) as an attachment to your written response to this letter. Because of the FCC's March 31, 1999, deadline for carriers to supplement waivers, we must ask that your written response to this letter be forwarded in sufficient time to ensure its receipt by Public Service Cellular, Inc. by no later than March 29, 1999.

□In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Nov. 13, 1998.

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Questions:

- A. Is the infrastructure equipment which you provided to Public Service Cellular, Inc. and Public Service Cellular, Inc. is presently operating, capable in its current form or with presently commercially available upgrades, of providing full support and access to TTY devices to ensure reliable access to 911 services by persons utilizing such TTY devices sufficient to enable Public Service Cellular, Inc. to fully comply with the requirements of Section 20.18 of the FCC's rules? If so, please provide a formal quote and pricing information in accordance with the terms and conditions of our Equipment Supply Agreement. If not, please provide answers to the remaining questions.
- B. What steps is Lucent Technologies, Inc. taking or intending to take to provide carriers utilizing its infrastructure equipment with the ability to provide users of TTY devices with the capability to operate such devices in conjunction with digital wireless systems in compliance with Section 20.18 of the rules?
- C. When do you intend to make this capability available to your infrastructure users to enable them to provide full Section 20.18 compliant service to TTY users? This information should include well-documented timetables and milestones regarding the implementation of this capability.
- D. What reasonable steps are you taking to address the consumer concerns listed below? Where the requested capability is network independent, i.e., your infrastructure equipment could provide that capability now to a common TTY device deployed within the past ten (10) years, please so indicate. Where the system cannot provide that capability to a properly functioning common TTY device deployed within the past ten (10) years, please indicate whether the item requested is technologically feasible with modification to the infrastructure equipment and, if so, an approximate time frame for implementation of that capability.

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Consumer Concerns:

1. That the character error rate should approximate that of AMPS, which has been demonstrated at < 1% for stationary calls.
 2. That the TTY caller be able to visually monitor all aspects of call progress provided to voice users. Specifically, the ability to pass through sounds on the line to the TTY (so that the user can monitor ring, busy, answered-in-voice, etc.) should be provided.
 3. That there be a visual indication when the call has been disconnected.
 4. That volume control capability should be provided.
 5. That the TTY user must have a means of tactile (vibrating) ring signal indication.
 6. That the caller must be able to transmit TTY tones independent of the condition of the receiving modem. (This is to permit baudot signaling by pressing a key, to let a hearing person know that the incoming call is from a TTY).
 7. That the *landline* party's TTY must not require retrofitting in order to achieve the desired error rate.
 8. That the *wireless* party's TTY may require retrofitting, or a new model TTY to be developed, or the use of a portable data terminal such as a personal digital assistant.
 9. That VCO and HCO should be supported where possible.
 10. That reduction of throughput (partial rate) on Baudot is highly undesirable and should not be relied upon to achieve compliance (See #7). It may be useful as a user-selectable option to improve accuracy on a given call.
 11. That call information such as ANI and ALI, where provided in wireless voice, should also be provided for TTY calls.
 12. That the solution need not support seldom little-used or obsolete TTY models, but in general should support the embedded base of TTY's sold over
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the past ten years. The landline equipment supported must not be limited to that used in Public Service Answering Points (911 centers).

13. That drive conditions must be supported, again using AMPS as a benchmark.

It is Public Service Cellular, Inc.'s understanding that each and every consumer item addressed above is available today in an AMPS environment. If you have responded that any of the items identified above are not technically feasible with the digital protocol which Public Service Cellular, Inc. has deployed with your infrastructure equipment, please provide sufficient technical detail to enable Public Service Cellular, Inc. to properly explain that limitation to the FCC. Also, please identify whether that limitation is inherent to your company's infrastructure equipment or an inherent limitation in the digital protocol.

Should you have any questions with respect to this matter, please do not hesitate to contact me. In light of the extremely short time frame which the FCC has allowed for Public Service Cellular, Inc. to seek a waiver, your prompt attention to this matter would be sincerely appreciated.

Very truly yours,



Don E. Bond
President